

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Global Brokerage, Inc. f/k/a FXCM, Inc. Securities Litigation	Master File No. 1:17-cv-00916-RA-BCM <u>CLASS ACTION</u> STIPULATION AND [PROPOSED] ORDER EXTENDING THE BRIEFING SCHEDULE FOR PLAINTIFFS’ AMENDED MOTION FOR CLASS CERTIFICATION
This Document Relates To: All Actions	

This Stipulation is entered into between Lead Plaintiffs 683 Capital Partners, LP and Shipco Transport Inc. (“Shipco”) and Movant E-Global Trade and Finance Group, Inc. (collectively, “Plaintiffs”) and Defendants Global Brokerage, Inc. f/k/a FXCM, Inc., Dror Niv, and William Ahdout (collectively, “Defendants”).

WHEREAS, as discussed during the status conference with the Court on April 13, 2020, Shipco’s corporate representative will be unable to sit for his deposition as scheduled on April 16, 2020 due to urgent developments affecting Shipco’s shipping business in the wake of the COVID-19 pandemic;

WHEREAS, Shipco’s corporate representative expects to make himself available for Shipco’s deposition by no later than May 22, 2020;

WHEREAS, Plaintiffs filed their Amended Motion for Class Certification and Appointment of Class Representative and Class Counsel (“Amended Motion”) on April 9, 2020;

WHEREAS, Defendants’ deadline to file their opposition to the Amended Motion is May 8, 2020, and Plaintiffs’ deadline to file their reply in support of the Amended Motion is June 22, 2020;

WHEREAS, on February 28, 2020, the parties requested an extension of the briefing deadlines related to the Amended Motion, which was granted by the Court on March 2, 2020;

WHEREAS, on April 2, 2020, the parties requested a second extension of the briefing deadlines related to the Amended Motion, which was granted by the Court on April 6, 2020;

IT IS HEREBY STIPULATED AND AGREED by the undersigned that Defendants' deadline to oppose the Amended Motion is extended to June 12, 2020, and Plaintiffs' deadline to file their reply in support of their Amended Motion is extended to July 27, 2020.

THE ROSEN LAW FIRM, P.A.

/s/ Joshua Baker

Phillip Kim
Laurence M. Rosen
Joshua Baker
275 Madison Avenue, 40th Floor
New York, New York 10016
Telephone: (212) 686-1060
Fax: (212) 202-3827
Email: pkim@rosenlegal.com
Email: lrosen@rosenlegal.com
Email: jbaker@rosenlegal.com

Lead Counsel for Lead Plaintiffs

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

Matthew M. Guiney
270 Madison Avenue
New York, NY 10016
Tel: (212) 545-4600
Email: guiney@whafh.com

Additional Counsel

KING & SPALDING LLP

/s/ Paul R. Bessette

Paul R. Bessette
Israel Dahan
1185 Avenue of the Americas
New York, New York 10036-2601
Tel: (212) 556.2100
Fax: (212) 556.2200

Rebecca Matsumura, *pro hac vice*
500 W. 2nd Street Suite 1800
Austin, Texas 78701
Tel: (512) 457.2000
Fax: (512) 457.2100

Attorneys for Defendants

SO ORDERED, on this ____ day of _____, 2020

Barbara C. Moses
United States Magistrate Judge